

ALMETTA B. PERRY  
Full name(s)

2645 E. RIVERSIDE DRIVE  
Street address or postal box number

INDIANAPOLIS, IN 46208  
City, State and zip code

(317) 926-1079  
Phone Number

FILED  
U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
2014 JAN 17 PM 4:19

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF INDIANA

Civil Action No. 1 : 14 -cv- 0084 WTL -TAB  
(To be supplied by the Court)

ALMETTA BEATRICE PERRY  
Plaintiff(s)  
Full name(s) (Do not use *et al.*)

v.  
BLACKSTONE GROUP L.P / STEPHEN ALLEN SCHWARZMAN  
HILTON WORLDWIDE INC / CHRISTOPHER J. NASSETTA  
Defendant(s).  
Full name(s) (Do not use *et al.*)

CIVIL RIGHTS COMPLAINT

A. PARTIES

1. I, ALMETTA BEATRICE PERRY, am a citizen of INDIANA  
(Plaintiff name(s)) (State)

and presently reside at 2645 E. RIVERSIDE DRIVE  
(mailing address)

2. Defendant Stephen A. Schwarzman is a citizen of New York  
(name of first defendant) (State)

whose address is 345 PARK AVENUE New York City

3. Defendant Christopher J. Nassetta is a citizen of VIRGINIA  
(name of second defendant) (State)

whose address is 7930 JONES BRANCH DRIVE, McLEAN, VIRGINIA 22102

(If more space is needed to furnish the above information for additional defendants, continue on a blank sheet which you should label "A. PARTIES." Be sure to include each defendant's complete address and title.)

#### B. JURISDICTION

1. This cause of action is brought pursuant to Diversity and Federal Question

2. \_\_\_\_\_ Jurisdiction also invoked pursuant to 28 U.S.C. § 1331. (If you wish to assert jurisdiction under different or additional statutes, you may list them below.)

#### C. NATURE OF THE CASE

**BRIEFLY** state the background of your case.

I am the victim of a white collar crime involving the City of Indianapolis. I was employed by Hilton Worldwide Inc (Conrad Indianapolis) from August 19, 2010 until I was wrongfully terminated while on sick leave January 20, 2012. I was harassed during and after my employment with the Conrad by management at the direction of the owner; Al Kite. Many of the lawyers and politicians involved in this federal investigation are associates of Mr Kite.

C. NATURE OF THE CASE

CONT'D

THE treatment I received was so troubling I tried to make contact with the Marion County Prosecutor AND the U.S. Attorney of Indianapolis. When that failed, I kept every document to support my claims AND A DIARY.

While tormenting me to amuse his colleagues Al Kite forgot ONE important fact. Although he owned the building he did not own the brand. I was an employee of Hilton Worldwide Inc. As key members of Blackstone Group LP and Hilton Worldwide Inc, Mr Schwarzman and Mr Nassetta do not have in place policies to protect their employees from unscrupulous owners.

D. CAUSE OF ACTION

CONTO CLAIM I

ALISHA BRAWLEY (HEAD of HUMAN Resource) told me while IN the locker room CHANGING INTO my UNIFORM my "breast" WERE EXPOSED AND IT WAS OFFENSIVE TO THE OTHER TEAM MEMBERS. I told her YASMILDA was the only other person IN the locker room that day. ALISHA slides a Corrective Action Form IN front of me with a SMIRK on her face. BEING that I was still ON my PROBATIONARY period I felt if I did NOT sign the form I would be fired.

After I signed the write up I ASKED for a copy.

I WANT the DEFENDANTS IN THIS CASE please explain to ME AND jury WHAT AREA IN THE HOTEL IS APPROPRIATE to CHANGE clothes if the locker room is NOT. Also if YASMILDA IS A WOMAN how IS another woman CHANGING clothes OFFENSIVE? Clearly this IS A form of harassment.

## D. CAUSE OF ACTION

I allege that the following of my constitutional rights, privileges, or immunities have been violated and that the following facts form the basis of my allegations: (If more space is needed to explain any allegation or to list additional supporting facts, continue on a blank sheet which you should label "D. CAUSE OF ACTION.")

**Claim I:** HUMAN RESOURCE HEAD: ALISHA BRAWLEY gave me A VERBAL WARNING IN WRITTEN FORM for VIOLATION of APPEARANCE AND GROOMING POLICY AND HARASSMENT-FREE POLICY. IT WAS AT THE direction of the only witness, HEAD OF Housekeeping YASMILDA.

**Supporting Facts:** (Include all facts you consider important, including names of persons involved, places, and dates. Describe exactly how each defendant is involved. State the facts clearly in your own words without citing legal authority or argument.)

ON or about MAY 20, 2010 (a month after being hired in housekeeping)  
I am in the locker room CHANGING from my street clothes to my  
UNIFORM. I am the only person in the locker area AND I  
could hear someone in the stall. My locker door is OPENED  
AS A SHIELD WHILE I am putting on my bra. SUDDENLY I  
see YASMILDA (HEAD of Housekeeping) come out from the stalls  
TOWARDS me. I spoke AS SHE PASSED me but SHE stops  
AND STARE AT ME. A week later I am called into Human  
Resource for Violation of Appearance AND GROOMING Policy  
AND HARASSMENT-FREE work place policy. (Continue pg 3A)

**Claim II:** I WAS falsely accused of stealing A \$700 iPad  
by the Hotel Security. I WAS told that the Hotel guest  
called the police to file A report. The Hotel Security  
MADE UP this story.

**Supporting Facts:**

WHEN reporting to work ON the SUNDAY OF BLACK Expo  
weekend, July 17, 2011 my team leader in TURNDOWN  
(Carolyn) told me to report to Security once I

(CONTINUE 3B)

D. CAUSE OF ACTION  
CLAIM II CONT'D

changed clothes. I went to the Security OFFICE located in the basement. Pat Thurston (Assistant Security HEAD) Asked me to sit DOWN, AND closed the DOOR. Mr Thurston Asked me if I serviced Room 703 the night before AND I said yes. HE goes ON to say a \$700 IPAD is missing from the room, my Key is the only one that unlocked the guest's room since they arrived July 15, 2011. THE guest called the police AND MADE A Report. I became very upset AND told Pat he could ASK MANDY (room service attendant) to verify that I WAS finishing the room WHEN SHE came to pick up the tray. IN closing Pat said the guest would be checking out the next DAY July 18, 2011 at 11AM.

The Next morning I called Brad Lingle (HEAD OF SECURITY) AND left a message stating I would take a lie detector test before the guest checked out. I left my phone number and told him I would wait for his called. He never called.

That afternoon when I arrived At work Pat told me Not to worry about the incident. HE said he called the guest AND ASKed her to come DOWN to the Security OFFICE because he HAD NEW INFORMATION ON the case. HE SAID

CLAIM II

The guest left without checking with Security. Pat told me in a lower voice, don't tell Nobody. I thought that was strange. I went to the locker room to change 15 minutes later as I was leaving I saw Pat talking to Mandy. I heard him tell her, "so don't tell nobody." Something was wrong.

I let 3 weeks go by to make sure everything was forgotten. One afternoon when I arrived to work I saw Brad Lingle sitting in his office. I asked Mr Lingle what did the Conrad do about the guest in room 703. He told me he did not understand. I told "Mr Head of Security" that filing a false report is a crime and the Hotel pursue this case. His eyes got as big as grapefruits as I got on the elevator. By the time I got to the locker room Brad must have taken the steps up to the 4<sup>th</sup> floor because he was rushing to get to the administration office. Suspiciously I wrote note to the Marion County Prosecutor to found out if a policeman made a run to the Conrad Hotel on July 17, 2011. The team leaders (Mario and Deanna) who worked that weekend told me there is no stolen IPAD and there were no police in room 703.

CONT'D pg 4



What raised my eyebrows is AFTER Pat Thurston told me he called the guest in room 703 AND SAID he found NEW information in the case. Why would he ask them to come DOWN to the Security Office in the basement before checking out? Being that the Conrad is A "5 star Hotel" shouldn't the Hotel Security meet with them in their rooms?

Claim III: I WAS A TURNDOWN ATTENDANT with assigned floors 6-9 or 10 depending on the capacity of the Hotel. Mr Kite had a friend named Deborah Dorman. She moved into room 803 and 804 with her husband. She tried to set me up.

Supporting Facts: 12 25 10

ON Christmas Day while on turndowns Mrs Dorman left her door unlocked. A guest at the hotel or any employee could have walked in and stole her blind. I called Security, they came up AND SAID he would document the incident just in case. I had worked my way down the hall when Mrs Dorman came up on the service elevator. I told her she left her door unlocked AND ASKED how long WAS SHE GONE. She said her granddaughter must have left it unlock and SHE HAD BEEN GONE 6 hrs. The next day when I saw her

CONT'D 4A

#### E. PREVIOUS LAWSUITS

Have you been or are you now a party to any other lawsuit(s) in state or federal court dealing with the same facts involved in this action? \_\_\_ Yes ☒ No.

If your answer is "Yes," describe each lawsuit. (If there is more than one lawsuit, describe the additional



D. CAUSE OF ACTION  
CLAIM III CONT'D

She SAID her expensive WHITE COAT WAS MISSING. I told her, "Well you know I wouldn't TAKE it!"

Four months later I went to do turn-downs in Mrs Dorman's room, and there was a BANANA REPUBLIC bag on her bed WITH my NAME on it. SHE told me to TAKE these clothes AS A GIFT. Mrs Dorman wear between a size 2 and 4. I wear between a size 12 to 14. I looked around the room for a hidden camera because I got a bad feeling. I left A NOTE saying I was not allowed to TAKE any gifts from the guest.

THAT NIGHT the same young security guy who worked Christmas Night 2010 (AARON) I asked him if Mrs Dorman filed a report with Security about her expensive WHITE COAT missing that evening. HE looked it up AND SAID, NO.

You mean to tell me you are giving expensive clothes away 10 sizes too small while you're not AT HOME?

Mrs Dorman is personal friends with the owner AL KITE yet you don't file A report with the Hotel, but you tell the housekeeper. Seems like Mr Kite would have got to the bottom of this thief if it were true.

CLAIM IV

I was wrongfully terminated by the Conrad while I was on sick leave. To make matters worse the Insurance Company (Aetna) and my foot Doctor's business manager abuse their authority.

Supporting Facts

I went to Human Resource in late summer of 2011 and told Amy (Human Resource Head) I was taking off time for foot surgery in November of that year. Amy gave me a paper for my doctor to fill out. Dr. Malament filled out the Family Leave forms stating it would begin on November 4, 2011 and would last between 10-12 weeks. He explained the procedure and said my return date would be on or about February 1, 2012. I told my doctor while in his office I was a victim of white collar crime and I want my treatment to be kept between him, myself and his head nurse Melanie. I told him how I kept a diary about how badly I was treated at the Conrad. He had this business manager named Janet Phillips who I never met before who was overly concerned about my case.

When I had my surgery we decided to it at the last minute so no one would know the exact date.

Carla

D. CAUSE OF ACTION

Claim IV Cont'd

The surgery was performed on January 23<sup>rd</sup>, 2012.

A week later while in bed recuperating I received a letter from Cobra. I was told that I was terminated on January 20, 2012 and my insurance was discontinued on January 19, 2012. In shock, I called Human Resources at the CONRAD. Amy moved to Miami and Ten Gray was in charge. I asked him why was I fired because I still had 2 weeks left on my FMLA. He said no one told him I was fired. So if Human Resource did not know I was fired then my termination came from the top.

I also won my unemployment which the CONRAD fought hard not to pay me.

Any other information can be obtained through CBS 60 Minutes, the Department of Justice or the FBI.

lawsuits using this same format on a blank sheet which you should label "E. PREVIOUS LAWSUITS.")

a. Parties to previous lawsuit:

Plaintiff(s): \_\_\_\_\_

Defendant(s): \_\_\_\_\_

b. Name and location of court and docket number \_\_\_\_\_

c. Disposition of lawsuit. (For example, was the case dismissed? Was it appealed?  
Is it still pending?)  
\_\_\_\_\_

d. Issues raised: \_\_\_\_\_

e. Approximate date of filing lawsuit: \_\_\_\_\_

f. Approximate date of disposition: \_\_\_\_\_

#### F. REQUEST FOR RELIEF

I request the following relief:

For the harassment, wrongful termination, invasion of my  
privacy, humiliation, AND MAIL FRAUD committed by officers  
of Hilton World Wide doing business as Conrad Indianapolis  
I am asking the court for the amount of \$50,000,000  
FIFTY Million Dollars

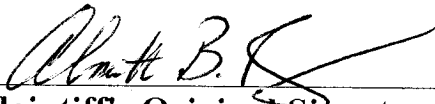
\_\_\_\_\_  
Original signature of attorney (if any)

  
\_\_\_\_\_  
Plaintiff's Original Signature

### DECLARATION UNDER PENALTY OF PERJURY

The undersigned declares under penalty of perjury that he/she is the plaintiff in the above action, that he/she has read the above complaint and that the information contained in the complaint is **true and correct**.

Executed at INDIANAPOLIS on 1-17-14  
(location) (date)

  
Plaintiff's Original Signature

I request the Court's assistance in serving process on the defendant(s). ☒ Yes ☐ No

Plaintiff demands a trial by jury. ☒ Yes ☐ No